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Attorney for Defendant
LOUIS M. KEALOHA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 17-00582 JMS (02)
)	
Plaintiff,)	MOTION FOR A BILL OF
)	PARTICULARS
vs.)	
)	
LOUIS M. KEALOHA,)	
)	
Defendant.)	
_____)	

MOTION FOR A BILL OF PARTICULARS

COMES NOW the defendant, LOUIS M. KEALOHA, through his attorney, Rustam A. Barbee, and moves this Honorable Court to direct the filing of a Bill of Particulars. Defendant is unable to ascertain from the face of the Indictment the nature of the case against him because of the lack of specificity and thus to prepare his defense. Mr. Kealoha moves that the Court order the government to state the following:

**COUNTS 5 and 6, Obstruction of Official Proceeding,
18 U.S.C. sec. 1512 (c) (2)**

1. The exact act(s) engaged in by defendant Louis M. Kealoha which allegedly indicate, or tend to indicate that he intentionally and/or knowingly obstructed an official proceeding;
2. The time and place of the act(s) engaged in by defendant Louis M. Kealoha which allegedly constitute the obstruction of official proceeding; and,
3. The names and addresses of person or persons present at the time when the defendant, Louis Kealoha allegedly obstructed an official proceeding.

COUNT 7, False Statements to Federal Officer, 18 U.S.C. sec. 1001

1. The exact act(s) engaged in by defendant Louis M. Kealoha which allegedly indicate, or tend to indicate that he intentionally and/or knowingly made a false statement to a federal officer;
2. The time and place of the act(s) engaged in by defendant Louis M. Kealoha which allegedly constitute a false statement to a federal officer; and,
3. The names and addresses of person or persons present at the time when the defendant, Louis M. Kealoha allegedly made a false statement to a federal officer.

This motion is made pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure and is based upon the attached memorandum and declaration of counsel and upon such further evidence and argument as received by the Court at a hearing on this motion.

DATED: Honolulu, Hawaii, November 6, 2017.

/s/Rustam A. Barbee
RUSTAM A. BARBEE
Attorney for Defendant
LOUIS M. KEALOHA